

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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IN RE APPLICATION OF EURASIAN :
BANK JSC AND EURASIAN PROJECT 1 :
LLP, : Case No.
: Petitioners,
for an order pursuant to 28 U.S.C. § 1782 to :
conduct discovery for use in a foreign :
proceeding.

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***EX PARTE APPLICATION FOR AN ORDER PURSUANT TO 28 U.S.C. § 1782
TO CONDUCT DISCOVERY FOR USE IN A FOREIGN PROCEEDING***

MORVILLO ABRAMOWITZ GRAND
IASON & ANELLO P.C.
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Pursuant to 28 U.S.C. § 1782, Eurasian Bank JSC and Eurasian Project 1 (“Petitioners”) respectfully apply *ex parte* for an order pursuant to 28 U.S.C. § 1782 (“Section 1782”) permitting them to seek discovery for use in criminal proceedings currently pending in Kazakhstan (the “Petition”). Petitioners respectfully request that the Court endorse the proposed order attached as Exhibit A to the concurrently-filed Memorandum of Law submitted in support of the Petition, which authorizes Petitioners to serve the subpoenas attached as Exhibit B to the Memorandum of Law.

For the reasons set forth in the Memorandum of Law, this Petition meets each of Section 1782’s statutory requirements and also satisfies each of the discretionary factors that courts consider in deciding whether to authorize discovery under Section 1782. This Petition is further supported by the concurrently-filed Declarations of Aleksandr Georgievich Orlov and Dmitry Anatolievich Golubinsky and the exhibits attached thereto.

Dated: December 11, 2019
New York, New York

Respectfully submitted,

MORVILLO ABRAMOWITZ GRAND IASON &
ANELLO P.C.

/s/ Christopher B. Harwood

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